DRAFT MEETING SUMMARY

HPNS Parcel G Removal Site Evaluation Work Plan Meeting

MEETING DATE:	July 17, 2018
LOCATION:	San Francisco, CA
ATTENDEES:	**EPA and consultants:** Karla Brasaemle (by phone) John Chesnutt Jana Dawson (by phone) Donna Getty (by phone) Angeles Herrera David Kappelman (by phone) Lily Lee **DTSC:** Nina Bacey Janet Naito Julie Pettijohn **CDPH:** Ron Piloran Sheetal Singh Matt Wright **Navy BRAC and consultants:** Steve Banister (by phone) Pat Brooks Scott Hay Kim Henderson Danielle Janda Lawrence Lansdale Alex Lopez Thomas Macchiarella

I. Introductions and Meeting Objectives

Angeles kicked off the meeting and indicated EPA's goal for the meeting is to aim for agreement and if that is not possible, to gather an understanding of everyone's position. Lawrence presented the Navy's goal for the meeting to discuss big picture concerns and how the team can work together to facilitate field mobilization and data collection that will help with the decision-making. The longer it takes to get into the field raises more questions and breeds speculation.

Angeles recognized that the Navy and regulators have a common goal to make sure people that may live in Parcel G will be safe. Ultimately, EPA needs to present a work plan that gives that confidence and something they can stand by. What EPA's seen up to today does not give EPA this confidence. EPA does not believe they have any data that can be relied upon and that we must start from scratch and that there are philosophical differences between the Navy and EPA on the approach. In this latest version of the work plan, 25% of their comments were not addressed and the commitments made in meetings are not reflected in the work plan. Lawrence indicated that most of the comments on the February 2018 version of the work plan were overcome by events as the work plan was rewritten based on the meeting discussions and there was not the consensus that the Navy thought the team had come from previous meetings so the Navy would like to discuss the comments and start responding.

Angeles indicated that the EPA's plan is to have this conversation and hopefully come to agreement. If the team cannot come to an agreement, at the end of the public comment period, the EPA plans to submit a strong message with their comments that they have been working with Navy for two years and cannot come to agreement. If EPA does not get the confidence they need, they will go to dispute. EPA's messaging has been consistent since 2016, to start from scratch following the ROD rather than spending time on data evaluation.

II. Comments and Discussion

Sheetal reviewed the regulators big picture comments and the discussion was as follows:

- **Comment 1: Need a trigger for 100% excavation -** If concentrations are above the RG and not proven to be background or NORM, 100% excavation would be needed. To achieve 95% confidence that 95% of TUs are clean, 100% of samples within the 33% of TUs would need to be clean. It was also requested to include this rationale per EPA's comments on the February 2018 work plan in Attachment 2.1.
    - The Navy indicated that since the team has not agreed on the failure criteria, the plan is to conduct the investigation first, evaluate the results, and if concentrations are above the RGs, a report will be prepared with recommendations for follow-on actions. This work plan is not the final document, it is an investigation work plan, not intended to be for remediation, that will require data evaluation and follow-up reporting and recommendations that will be subject to regulatory review and concurrence. The approach is to hold off on disputing the failure criteria and speculating the results, collect the data, and regroup with the team to have meaningful path forward discussions with data. The Navy is concerned with cleaning up background and NORM. Even with the new background study, if an average NORM value is used for Cs-137, the Navy may still be cleaning up concentrations from fallout.
    - Nina indicated that the regulators need written guarantee that 100% exaction is an option. The Navy proposed adding language to clarify that the next step will include 100% excavation if the results indicate Navy-related contamination.
    - The team discussed whether the work plan should only include Phase 1 and indicate that in the title and text. Danielle explained that the Navy included Phase 2 because if based on the results of Phase 1, there are no exceedances of the RGs, Phase 2 will be completed and Parcel G work will be done. The Navy acknowledged that this is a risk they would take with the goal to facilitate closure if possible.

- **Comment 2: Phase 2 needs 100% surface scans of TUs and SUs -** Phase 2 does not include surface scans as requested. Only scans of the cores are included.

- **Comment 3: Phase 2 needs more core sampling locations -** Phase 2 does not include 18 sample locations with 3 samples each and does not include additional cores every 50 linear feet outside the trench as requested.
    - Six locations with 3 samples from each core are proposed from inside the trench and outside the trench. The regulatory comments were not specific on Phase 2 and referenced 18 samples and collection of samples from inside and outside the trench. The Navy designed an approach to enable evaluation of average activity and risks to human health and the environment. The sample coverage outside the trench could achieve the 50 linear feet recommendation.

- **Comment 4: Phase 1 needs sidewall and bottom scanning -** Although the work plan includes over-excavation and scanning, sidewall and bottom scanning is requested.

- **Comment 5: Number of samples**
    - Background reference areas – There are only 20 samples planned in the onsite surface soil and 25 are recommended. Additionally, samples should not be collected at bottom of slopes where accumulation may have occurred.
        - The Navy indicated that the number of samples was based on NUREG 1505 Section 13 that states "four reference areas each with between 10 and 20 samples in each should generally be adequate." The sample locations can be flagged and a site visit conducted with the regulators prior to sample collection.
    - Parcel G- The number of samples per TU/SU should be calculated based on the variability actually measured.

    - Eighteen samples are based on previous work at HPNS and per regulators proposal.

- **Comment 6: Phase 1 selection of TUs and SUs -** The regulators do not agree on 50% of the selected Phase 1 TUs and SUs and EPA has a list they will provide.

III. Path Forward

The regulatory agencies have detailed technical comments drafted. Prior to comment submittal, the team will have a separate technical discussion on comments 2 through 6. For the bigger picture comment 1, the regulatory agencies will regroup and discuss and consider the proposal to add language to the work plan to clarify that the next step may include 100% excavation.